

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JUSTIN LADD SPOTTED BEAR

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 2244(a)(5),  
2244(b), and 1153

**COUNT ONE**

**Abusive Sexual Contact of a Child**

The Grand Jury Charges:

From in or about 2018 to in or about 2019, in Indian country, and within the  
exclusive jurisdiction of the United States,

JUSTIN LADD SPOTTED BEAR,

an Indian, knowingly engaged in and caused sexual contact, that is, the intentional  
touching, directly and through the clothing, of the genitalia, anus, groin, buttocks, and  
inner thigh of H.R. (YOB 2008), an Indian child under 12 years of age, with an intent to  
abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person;

In violation of Title 18, United States Code, Sections 2244(a)(5) and 1153.

COUNT TWO

**Abusive Sexual Contact**

The Grand Jury Further Charges:

From in or about August 2019 to in or about December 2019, in Indian country,  
and within the exclusive jurisdiction of the United States,

JUSTIN LADD SPOTTED BEAR,

an Indian, knowingly engaged in and caused sexual contact, that is, the intentional  
touching, directly and through the clothing, of the buttocks of C.H., with an intent to  
abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person;

In violation of Title 18, United States Code, Sections 2244(b) and 1153.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Nicholas W. Chase

NICHOLAS W. CHASE

Acting United States Attorney

EBL/tmg